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November 8, 2018

Hon. Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Doyle, et al.*
Dkt. No.: 18-MJ-927

Dear Judge Mann:

I am retained counsel to Defendant Marina Golfo. I write to respectfully ask the Court to set a bond hearing for Friday, November 9, 2018, so that we may move the Court for a modification of Ms. Golfo's conditions of release to permit her to travel to Paris, France from November 21 to November 24, 2018, to spend the Thanksgiving holiday with her two daughters.

By way of background, Ms. Golfo is the biological mother to two daughters who are currently attending college. Laura Golfo is a student at Wake Forest University in North Carolina. Laura is currently spending a semester studying abroad in Prague, Czech Republic. Ms. Golfo's second daughter, Julia Golfo, is a student at the University of Vermont. Ms. Golfo, who is divorced, has a very close relationship with her daughters. Their father does not play a significant role in the girls' lives, and Ms. Golfo is their most important source of support. When they are not away at school, the girls live with their mother, and rely on her for almost everything. In particular, Laura suffers from, and is medicated for, anxiety, depression and obsessive compulsive disorder. Months before Ms. Golfo's recent arrest in EDNY, she and Julia planned a trip to spend Thanksgiving with Laura in Paris.

Specifically, on August 18, 2018, in advance of her arrest on October 4th, Ms. Golfo purchased airline tickets. She bought tickets for Laura and two of her classmates who also attend Wake Forest University, and who will be studying abroad in Prague, to travel from Prague to Paris from November 22 – 25, 2018 to meet with Ms. Golfo and Julia. Ms. Golfo and Julia are

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scheduled to fly from Newark to Paris on November 21, 2018 (Norwegian Air flight 7192), and return from Paris to Newark on November 24, 2018 (Norwegian Air flight 7191)¹.

On October 4, 2018, Ms. Golfo made her initial appearance before the Hon. Sanket J. Bulsara. On that date, she was released on a \$150,000 PRB, secured by the signature of one financially responsible person. As is routine, her travel was restricted to the Southern and Eastern districts of New York.

Ms. Golfo's strong ties to New York that contributed to her release on October 4, 2018, demonstrate that she is not a risk of flight if permitted to travel as requested. Ms. Golfo's entire life is here in New York. Her family resides here. Ms. Golfo is the sole caretaker of her two daughters with whom she has shared an impenetrable bond since they were born, and she would never abandon them or jeopardize their future. Ms. Golfo not only is their sole custodian, but she also provides all of their financial support. Both girls have lived in Pelham, New York, throughout their entire lives, and have known no other home. Ms. Golfo owns her cooperative apartment in Pelham, and she and her daughters are firmly entrenched in that home and community. In addition, Ms. Golfo's elderly parents live only a few miles from her. They rely on Ms. Golfo's support for many important aspects of daily living. Ms. Golfo also has more than a dozen extended family members, all of whom live within a 20-minute car ride from her residence.

Ms. Golfo's employment is also here in New York. She has worked for many years as a teacher of speech improvement in the New York City Department of Education, District 75. Her job is very important to her and provides the means by which she supports her college student daughters. She expects to be tenured in her district in 2020, an accomplishment for which she has worked long and hard to achieve.

Ms. Golfo's close friends, neighbors and faith community are all in New York, including Domenick D'Angelica, her closest friend and the sole suretor of Ms. Golfo's bond. Domenick wrote a letter to the Court, attached as Exhibit A, which demonstrates his complete confidence that Ms. Golfo is no threat to flee. He fully understands the consequences he faces if Ms. Golfo were to flee, yet he fully approves of her making this important trip with her daughters. According to Mr. D'Angelica: "I fully support Marina's request to travel to Paris with her daughters. I am confident that she will continue to abide by the conditions set by this Court, and any others the Court may set if she is permitted to travel."

In sum, Ms. Golfo's ties to New York demonstrate that she does not pose a risk of flight if she travels with her daughters.

¹ Their full proposed itinerary, including flight and hotel information, has already been provided to the government and Pretrial Services.

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It is also worth mentioning that the loss amount alleged in this case is relatively low. While Ms. Golfo is charged with health care fraud offenses that subject her to a potential felony conviction, the anticipated advisory sentencing guidelines are not expected to exceed three years imprisonment, and she faces no mandatory minimum sentence.

Further, while we acknowledge that every defendant's circumstances are different, last week Magistrate Judge Lois Bloom held a bond hearing for Ms. Golfo's co-defendant Lyubov Beylina, following which Ms. Beylina's request to travel to Aruba with her family was granted. Because Ms. Golfo's circumstances are similar to Ms. Beylina's, Magistrate Judge Bloom's decision lends some additional support for Ms. Golfo's request.

Lastly, Ms. Golfo is of limited financial means and has demonstrated her intention to participate in this case with good faith. She exhausted all of her finances and credit to secure private counsel. Since then, she has spent an extraordinary amount of time with my firm combing through documents to create a work product that we intend to share with the government to highlight why we believe she is actually innocent of the charges in the complaint. As I expressed to the government, I plan to submit a DP letter and arrange an innocence proffer. Ms. Golfo has taken this case seriously and has abided by every condition of release since October 4th.

For all these reasons, we ask that the Court grant Ms. Golfo's request to modify her conditions of release to permit her to travel to Paris, France from November 21 to November 24, 2018.

I have spoken to Pretrial Services by Officer Celine Ferguson, who has no objection to this request. I have also spoken to the Government by A.U.S.A. Ryan Harris. According to Mr. Harris, the government does not consent to this request.

The Court's consideration of this request is greatly appreciated. We look forward to answering any questions the Court may have on Friday, November 9, 2018.

Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

Sapone & Petrillo, LLP

Counsel to Defendant

Marina Golfo

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Hon. Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Dear Judge Mann:

On October 4, 2018 I signed the bond for Marina Golfo securing her release in her pending prosecution in the Eastern District of New York. I am an attorney admitted in New York State since January 1990. I'm also admitted in the Eastern District of New York. I am currently employed by the New York Liquidation Bureau.

I am writing this letter, as the suretor for Ms. Golfo's bond, to support her request to travel to Paris, France over the Thanksgiving Holiday. The purpose of her 3-day visit is to see her daughter Laura, who is a college student studying abroad for the semester. I've known about Marina's brief trip to Paris since it was planned months before her arrest. She and I discussed it while I was planning my own Thanksgiving trip to Madrid to visit my daughter studying abroad.

I have been close friends with Marina Golfo for several years. She and I share common backgrounds and have similar views about education and family values. We both have daughters that are the same age in their Junior years at college. Marina is just recently an "empty nester" with her youngest daughter in her Freshman year. This trip was planned before her arrest so that she and her daughters can be together for the first time in 3 months. Her daughters are her primary support and they have been away since this case began. Her younger daughter Julia is traveling with Marina and needs to be back on campus after the trip to finish her first semester at the University of Vermont.

Marina Golfo has always been an exemplary mother and an active member of the community in Pelham Manor, New York. I was present in court during her arraignment and had no hesitation acting as her surety for the \$150,000 bond. At that time, I knew that she had booked her trip to Paris. And today, knowing the consequences that I would face financially should Marina violate her conditions of release, I still have no reservations about supporting her travel request.

I fully support Marina's request to travel to Paris with her daughters. I am confident that she will continue to abide by the conditions set by this Court, and any others the Court may set if she is permitted to travel.

Marina has respect for our system of justice and is intent on establishing her innocence of the charges in the complaint. I'm confident that she will return to the United States as promised and that there is no risk of her violating the conditions of her release.

If the court has any questions, I remain happy to assist in any manner I can.



Domenick D'Angelica